

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,

Plaintiff,

v.

KELLY FITZPATRICK, an individual;
SABRINA KELLY-KREJCI, an individual;
KANG WANG, an unknown entity, d/b/a
SEVENSTAR;
PUTIAN WEISEN TRADING CO., LTD, an
unknown entity, d/b/a LWENSTORE; JOSE A.
PAGAN, an individual, d/b/a GAM SPORTS;
YAN RUIQUN, an individual, d/b/a
KALOSUHA; JESSE A. FASNACHT, an
individual, d/b/a BRADYYER; BRADY
MICHAEL ABBOTT, an individual;
ZHUXIUBING, an unknown entity, d/b/a
GOGO TRENDY; CHENMAOQING, an
unknown entity, d/b/a MYERH STORE;
QUANFUWOWANGLUOKEJI (SHENZHEN)
YOUXIANGONGSI, an unknown entity, d/b/a
KEABIE; JINJIANGSHI OUSAIER TRADE
CO., LTD, an unknown entity, d/b/a WINJOY
MALL;
JINANSHITIANQIAOQUNATAISHANGMAO
YOUXIANGONGSI, an unknown entity, d/b/a
BIIKII;
HANDANSHIHANSHANQUZUOCHANGMA
OYIYOUXIANGONGSI, an unknown entity,
d/b/a GBEEGBEE,

Defendants.

No. 2:20-cv-01662-RSM

**UNOPPOSED MOTION FOR
ENTRY OF CONSENT
DECREES WITH RESPECT TO
DEFENDANTS KELLY
FITZPATRICK AND SABRINA
KELLY-KREJCI**

NOTE ON MOTION CALENDAR:
SEPTEMBER 30, 2021

1 Plaintiff Amazon.com, Inc. (“Amazon”) moves this Court, with the consent of
2 Defendants Kelly Fitzpatrick and Sabrina Kelly-Krejci, for an order approving the entry of the
3 Consent Decrees attached as **Exhibit A** and **Exhibit B**. In support of the motion, Plaintiff states
4 as follows:

5 1. On November 12, 2020, Amazon filed this case alleging claims against the named
6 Defendants for the promotion and sale of fraudulently branded, counterfeit products in the
7 Amazon store, in violation of Sections 32 and 43(a) of the Lanham Act, 15 U.S.C. §§ 1114 and
8 1125(a), *et seq.*, and the Washington Consumer Protection Act, RCW 19.86, *et seq.* See Dkt. 1.

9 2. Amazon and Defendants Kelly Fitzpatrick and Sabrina Kelly-Krejci resolved the
10 claims in the Litigation through confidential settlements, effective as of September 22, 2021, and
11 September 24, 2021, respectively (“Settlement Agreements”). Pursuant to the Settlement
12 Agreements, Defendants Fitzpatrick and Kelly-Krejci have agreed to the entry of Consent
13 Decrees, attached as **Exhibit A** and **Exhibit B**, respectively, and do not oppose this Motion.

14 3. Accordingly, Amazon respectfully requests that this Court enter the Consent
15 Decrees.

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17 *[Signatures on the following page]*
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1 DATED this 30th day of September, 2021.

2 Respectfully submitted by:

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